Supreme Court, U.S.
FILED
JAN 11 1983
ALEXANDER L. STEVAS
CLERK

No. 81-1863

In the Supreme Court of the United States

OCTOBER TERM, 1982

UNITED STATES OF AMERICA, ET AL., APPELLANTS

v.

MARY T. GRACE, ET AL.

ON APPEAL FROM THE UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

REPLY BRIEF FOR THE APPELLANTS

REX E. LEE
Solicitor General
Department of Justice
Washington, D.C. 20530
(202) 633-2217

TABLE OF AUTHORITIES

Cases: Page

Adderly v. *Florida*, 385 U.S. 39 4
American Communications Association v. *Douds*, 339 U.S. 382 10
Broadrick v. *Oklahoma*, 413 U.S. 601 12
Carey v. *Brown*, 447 U.S. 455 4
Consolidated Edison Co. v. *Public Service Commission*, 447 U.S. 530 4
Cox v. *Louisiana (Cox I)*, 379 U.S. 536 4
Cox v. *Louisiana (Cox II)*, 379 U.S. 559 ..... 4, 7
Cox v. *New Hampshire*, 312 U.S. 569 4
Grayned v. *City of Rockford*, 408 U.S. 104 ....6, 10, 12, 14
Greer v. *Spock*, 424 U.S. 828 4
Heffron v. *International Society for Krishna Consciousness, Inc.*, 452 U.S. 640 4
Kovacs v. *Cooper*, 336 U.S. 77 4
Martin v. *City of Struthers*, 319 U.S. 141 4
New York v. *Ferber*, No. 81-55 (July 2, 1982) 13
Parker v. *Levy*, 417 U.S. 733 ..... 11, 12
Schneider v. State, 308 U.S. 147 4
Schweiker v. *Wilson*, 450 U.S. 221 6
United States v. *Mazurie*, 419 U.S. 544 11
United States v. *O'Brien*, 391 U.S. 367 ..... 4, 7
United States v. *Thirty-Seven Photographs*, 402 U.S. 363 13-14
United States Postal Service v. *Council of Greenburgh Civic Associations*, 453 U.S. 114 4
United States Railroad Retirement Board v. *Fritz*, 449 U.S. 166 6
Village of Hoffman Estates v. *Flipside, Hoffman Estates, Inc.*, No. 80-1681 (Mar. 3, 1982) 11, 12
Young v. *American Mini Theatres*, 427 U.S. 50 11

Constitution and statutes:

United States Constitution, First Amendment 1-2, 5, 6, 7, 8, 11, 13
18 U.S.C. 1507 .....1, 2, 6, 7, 8, 14
28 U.S.C. 2106 14

Constitution and statutes—Continued Page

28 U.S.C. 2109 14
40 U.S.C. 13k ..... *passim*
40 U.S.C. 13*l* 8

Miscellaneous:

H.R. Rep. No. 814, 81st Cong., 1st Sess. (1949) 5
Kalven, *The Concept of the Public Forum: Cox* v. *Louisiana*, 1965 Supp. Ct. Rev. 1 6
S. Rep. No. 719, 81st Cong., 1st Sess. (1949) 5

In the Supreme Court of the United States

OCTOBER TERM, 1982

No. 81-1863

UNITED STATES OF AMERICA, ET AL., APPELLANTS

v.

MARY T. GRACE, ET AL.

ON APPEAL FROM THE UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

REPLY BRIEF FOR THE APPELLANTS

Appellees' disagreement with the government on the range of expressive activities that must be permitted near the Supreme Court is narrow. Appellees do not contend that they must be allowed to picket or leaflet within the Supreme Court building itself. See also ACLU Am. Br. 3 n.2. They also acknowledge that Congress may, and in 18 U.S.C. 1507 did, constitutionally bar from the Court grounds demonstrators who are attempting to influence the Court. At the same time, it is undisputed that speakers are permitted to demonstrate or leaflet (subject to 18

U.S.C. 1507) directly across the street from the Court, or in appropriate cases in the street in front of the Court.[1]

This case, therefore, concerns only whether Congress may prohibit persons who are not directly addressing the Court from demonstrating on the Court's "curtilage"—the sidewalks of the square block on which the Court is located.[2] Specifically, the question on which we differ with appellees is whether requiring such demonstrators to move across the street so severely invades First Amendment rights that Congress is forbidden to choose that means of promoting the undeniably substantial interests—tangible and symbolic—furthered by Section 13k. Appellees devote relatively little of their argument to this issue.

1. Appellees assert in only the most cursory fashion that Section 13k makes it more difficult for dem-

---

[1] Indeed, according to appellees, when appellee Grace appeared on the Court grounds with her placard, a Supreme Court police officer merely asked her to step across the street. Appellees' Br. 5.

[2] Appellee and amicus curiae American Civil Liberties Union insist upon characterizing Section 13k as an "absolute" bar. See, *e.g.*, Appellees' Br. 20, 23; ACLU Am. Br. 3, 6. On its face, Section 13k only regulates speech of a certain manner, public demonstrations—contrary to appellees (Br. 10, 14), Section 13k obviously does not apply to private conversations—in a certain place, the Supreme Court grounds. Every time, place, or manner restriction can be said to be an "absolute" prohibition of expression at a particular time or place or of a particular manner, but such characterizations do not advance analysis. Indeed, amicus curiae ACLU appears to acknowledge (Br. 7 n.8) that its description of Section 13k as an absolute bar is only a conclusory way of asserting its view that the alternative means of expression it leaves open are inadequate.

onstrators and leafleters to reach persons on the Supreme Court grounds (Br. 39). Amicus curiae ACLU similarly argues that Section 13k will make it more difficult for demonstrators and leafleters to reach "their intended audience" (ACLU Am. Br. 7, 8). But neither Section 13k nor any other regulation of expression would ever be challenged unless it had some effect on the ability of speakers to reach "their intended audience." The Court has never suggested that the Constitution bars every regulation of speech that does not "permit the speaker to reach the intended audience as readily" (ACLU Am. Br. 7-8). On the contrary, as we explained in our opening brief, the Court has repeatedly upheld regulations that appreciably reduced a speaker's audience or the impact of his expression. See Appellants' Br. 15-16 (citing cases).

Even the ACLU concedes that "individuals * * * [who] leaflet and picket across the street from the Court * * * are clearly visible from the Court grounds" (Br. 20). Many persons going to and from the Court will come face to face with speakers across the street. Appellees (Br. 39) and the ACLU (Br. 8) object that Section 13k will force demonstrators to make larger signs and will reduce the number of members of their intended audience with whom they come into face-to-face contact. But if any regulation of expressive activities is to be allowed, these burdens must be considered minimal. They do not remotely approach the burdens on expression—such as a total prohibition on all leafleting or door-to-door solicitation, or a prohibition that effectively makes it impossible to reach residents of a neighborhood—that have caused the Court to invalidate regulations in the past. See Appellants' Br. 16-17 (citing cases). Neither appellees nor amici cite any case in which this Court

has held that the Constitution forbids the imposition of such slight burdens on expression in order to promote substantial government objectives. Compare *Heffron* v. *International Society for Krishna Consciousness, Inc.*, 452 U.S. 640, 654-655 (1981), *Adderly* v. *Florida*, 385 U.S. 39 (1966), *Kovacs* v. *Cooper*, 336 U.S. 77, 87-88 (1949) (opinion of Reed, J.), *Cox* v. *New Hampshire*, 312 U.S. 569, 574 (1941), *Cox* v. *Louisiana (Cox I)*, 379 U.S. 536, 554-555 (1965), and *United States Postal Service* v. *Council of Greenburgh Civic Associations*, 453 U.S. 114, 134-135 (1981) (Brennan, J., concurring), with *Carey* v. *Brown*, 447 U.S. 455, 468-469 n.13 (1980), *Martin* v. *City of Struthers*, 319 U.S. 141, 146 (1943), *Schneider* v. *State*, 308 U.S. 147 (1939), and *United States* v. *O'Brien*, 391 U.S. 367, 388-389 (1968) (Harlan, J., concurring).[3]

2. Like the court of appeals, appellees and the ACLU (*e.g.*, ACLU Am. Br. 12, 14) appear to acknowledge the importance of the concrete interests we advance in support of Section 13k—the need both

---

[3] The ACLU is plainly incorrect in suggesting (Br. 13-14) that the government must accord the public broad rights of expression in any place to which public access is generally permitted. The public is not generally restricted from being "near" a courthouse, but in *Cox* v. *Louisiana (Cox II)*, 379 U.S. 559 (1965), the Court held that a regulation akin to a content-based restriction of speech (see Appellants' Br. 30) may be imposed on that area. The demonstration in *Cox II* occurred on a sidewalk. Moreover, the military base at issue in *Greer* v. *Spock*, 424 U.S. 828 (1976), was open to a wide variety of civilian activities (see *id.* at 831; *Consolidated Edison Co.* v. *Public Service Commission*, 447 U.S. 530, 538 (1980)), but the Court nonetheless held that even a content-based restriction, excluding certain political activities, could lawfully be enforced. This case, of course, does not involve a content-based restriction, and the scope of permissible government regulation is accordingly greater.

to protect the judiciary from intimidation and to prevent members of the public from believing that the Nation's highest Court can be influenced in its decision-making by public demonstrations. Appellees and the ACLU also do not appear to deny that Section 13k in fact furthers these interests by preventing demonstrators from closely approaching the Court. Instead, they assert that we are precluded from advancing these interests as justifications for Section 13k because they are not mentioned in the legislative history (*e.g.*, Appellees' Br. 8, 10, 26) and because these interests are protected by 18 U.S.C. 1507, which they consider a narrower restriction than Section 13k (*e.g.*, Appellees' Br. 8, 10, 27, 44; ACLU Am. Br. 5, 15-16, 21 n.20).

a. Appellees recognize (Br. 16) that Congress's stated purpose for enacting Section 13k was to protect the dignity and decorum of the Supreme Court. See S. Rep. No. 719, 81st Cong., 1st Sess. 2 (1949); H.R. Rep. No. 814, 81st Cong., 1st Sess. 2 (1949). This purpose fairly comprises the interest in protecting against the real or perceived intimidation of the Court and the interest in preserving the Court's symbolic connotations (see Appellants' Br. 33-39). Moreover, as appellees acknowledge (Br. 17), Congress was aware that Section 13k would apply to activities within the purview of the First Amendment. It is unrealistic and inappropriate to expect that the legislative history will go further and rehearse the constitutional justifications for a statute in the detail that would be found in an appellate brief. The Constitution does not require Congress to create any legislative history at all, and members of Congress, even while properly attentive to constitutional concerns,

often will not describe their actions in the terms that would be used in constructing a legal argument. *United States Railroad Retirement Board* v. *Fritz*, 449 U.S. 166, 179 (1980).

The legislative history of Section 13k is more than sufficient to support the justifications we suggest. It shows that Section 13k is plainly not the product of legislative inadvertence or "thoughtless[ness]" (*Schweiker* v. *Wilson*, 450 U.S. 221, 239 (1981) (Powell, J., dissenting)). Moreover, as appellees concede, Congress did not ignore the First Amendment implications of Section 13k; while the enactment of Section 13k was not accompanied by the self-conscious weighing of First Amendment interests that accompanied the passage of Section 1507, that is undoubtedly because Congress—correctly—did not believe that the limited restriction imposed by Section 13k seriously burdens First Amendment rights. Nothing in the legislative history suggests that Section 13k was enacted for an illegitimate purpose. Most important, Section 13k is unlike, for example, a breach of the peace or disorderly conduct statute, because Congress unquestionably knew it was regulating expressive activities and little else when it enacted Section 13k; Section 13k is therefore "a deliberate, specific, and relevant legislative judgment" that expressive activity of a certain manner is inappropriate in a certain place. *Grayned* v. *City of Rockford*, 408 U.S. 104, 109 n.5 (1972), quoting Kalven, *The Concept of the Public Forum: Cox* v. *Louisiana*, 1965 Sup. Ct. Rev. 1, 32; see Appellants' Br. 32.

b. Appellees and the ACLU, like the court of appeals, do not explain how the existence of Section 1507 can render Section 13k invalid when "it has never been

suggested that there is anything improper in Congress' providing alternative statutory avenues of prosecution to assure the effective protection of one and the same interest" (*United States* v. *O'Brien*, 391 U.S. 367, 380 (1968)). In our opening brief, we explained that the two statutes are complementary (Br. 9-11, 27-32): by omitting the specific intent requirement of Section 1507, Section 13k reduces the opportunities for discretionary enforcement, necessarily based on the content of expression, that Section 1507 creates, and provides more complete protection against the real or perceived intimidation of the judiciary; and the principal reason for the specific intent requirement of Section 1507—to protect expression directed at an official unconnected to a court who happens to have an office in the same building (*Cox* v. *Louisiana (Cox II)*, 379 U.S. 559, 567 (1965))—is inapplicable to the Supreme Court.

Indeed, it is ironic that appellees and amici, who repeatedly assert their concern for First Amendment rights, should insist that Section 1507 is preferable to Section 13k. As the Court recognized in *Cox II*, *supra*, 379 U.S. at 568-569, the term "near" in Section 1507 presents significant vagueness problems and is prone to discriminatory enforcement; the geographical scope of Section 13k, by contrast, is defined with absolute precision. The specific intent requirement of Section 1507 is, as appellees and the ACLU recognize, akin to a restriction on the basis of content (Appellees' Br. 28; ACLU Am. Br. 17) and again leaves far more room for discretionary enforcement than Section 13k. Moreover, by appellees' and the ACLU's logic (see Appellees' Br. 11, 37; ACLU Am. Br. 15), Section 1507 is both underinclusive and overinclusive; not all expression that might be perceived as influencing a court

is intended to do so, and unquestionably not all expression that is intended to influence a court achieves its objective.

At bottom, appellees' argument that Section 13k is not narrowly tailored to the ends it promotes reflects a failure to recognize the practical difficulties of enacting any legitimate regulation that has an impact on expression—practical difficulties that Congress, unlike appellees, must face if it is to act. No regulatory measure can achieve a precise fit of means to ends; none can eliminate discretion entirely. The only alternatives to Section 13k suggested by appellees and amici are Section 1507—which serves important functions, and is well suited to courthouses that contain other official offices, but presents the difficulties we described—and the Marshal's open-ended, highly discretionary power under 40 U.S.C. 13*l* to issue regulations governing the Court grounds. See, *e.g.*, Appellees' Br. 28; ACLU Am. Br. 18. Section 13k reflects a balance that takes into account the divergent interests protected by the First Amendment—the interest in permitting expression and the interest in reducing the opportunities for discretionary enforcement—as well as the government's interests. Neither Section 13k nor any other statute can perfectly protect all of these interests at once; but appellees fail to show why Section 13k is not a reasonable accommodation, reached by a Congress specifically concerned with the dignity and decorum of the Supreme Court. Especially in view of the narrow range of disagreement between appellees and Congress (see pages 1-2, *supra*), this is more than enough to sustain the statute's constitutionality.

c. Appellees and amici do not question our assertion that Congress, in regulating public buildings and

grounds, may legitimately choose to advance symbolic objectives. Nor do they deny that Congress may, if it acts reasonably, limit the place or manner of expression in order to promote these objectives. They also do not question that the Supreme Court is a uniquely appropriate symbol of the calm reflection, free from insistent popular pressure, that should characterize the judicial process. Appellees and the ACLU do suggest that Congress was not actually concerned with symbolic objectives when it enacted Section 13k;[4] but even the court of appeals acknowledged (J.S. App. 23a-25a) that the dignity and decorum interests identified in the legislative history reflect an intention to promote symbolic objectives.[5]

Principally, however, appellees and amici take issue with Congress's decision to treat the building and grounds of the Supreme Court as a symbol of reflection and solemnity; they would rather the Court be a symbol of robust free expression (see, *e.g.*, Appellees' Br. 11, 32-33; ACLU Am. Br. 11; LULAC Am. Br. 4,

---

[4] Appellee and amici deny that Section 13k was intended to promote any of the objectives we attribute to Congress; but they do not explain what, in their view, Congress *was* attempting to do when it enacted Section 13k. Surely Congress must have had some objective in mind.

[5] The ACLU also appears to urge that since restrictions comparable to Section 13k applied to the Capitol grounds, Congress could not have been concerned with the symbolic functions of the Court. But the regulation of the Capitol grounds antedated Section 13k by many years. See Appellees' Br. 15. In any event, the fact that Congress attributed to other public buildings a symbolic importance that was later found inappropriate does not disqualify Congress from attempting to invest the Supreme Court with symbolic significance.

6-8, 24-29).[8] Similarly, appellees (Br. 38) and the ACLU (Br. 20) suggest that a restriction on expression will serve symbolic interests only if it is much broader than Section 13k; since we doubt that they would permit such a regulation to go unchallenged, this is tantamount to asserting that Congress cannot promote symbolic interests at all. In any event, plainly it is for Congress—not appellees or the courts—to determine the nature of the symbolic functions of public property and buildings, so long as Congress's choice is reasonable. Appellees do not show why Congress's choice here was unreasonable, suspect, or excessively restrictive.

3. Appellees also attack Section 13k by devising hypothetical examples that supposedly show that the terms of Section 13k can be interpreted to produce results that appellees consider absurd. See, e.*g.*, Appellees' Br. 21-22, 36. In itself this is a hollow exercise, unless appellees can establish that it entitles them to the relief they seek. "It will always be true that the fertile legal 'imagination can conjure up hypothetical cases in which the meaning of [statutory] terms will be in nice question.' " *Grayned* v. *City of Rockford*, *supra*, 408 U.S. at 110 n.15, quoting *American Communications Association* v. *Douds*, 339 U.S. 382, 412 (1950). "The applicable standard, however, is not one of wholly consistent academic definition of abstract terms." *Ibid.*

Appellees appear to assert first that the existence of these hypothetical examples renders Section 13k vague. See, *e.g.*, Appellees' Br. 29, 36, 40-41. Since the decision of the court of appeals does not rest on this basis, appellees presumably offer it as an al-

[8] "LULAC Am. Br." refers to the brief filed by amicus curiae League of United Latin American Citizens.

ternative ground for affirmance. But appellees' own activities—picketing and leafleting—are unquestionably within the prohibition of Section 13k; appellees have not suggested that the language of Section 13k leaves any doubt about its application to this conduct. Appellees acknowledge that their intention was to engage in expressive activities and that they were told only that they could not leaflet or picket (Br. 3-5). Moreover, their complaint did not allege that they were uncertain whether actions in which they proposed to engage would be proscribed by Section 13k.

Appellees' vagueness contention is, therefore, a claim that some other person, not a party to this case, might be unsure whether Section 13k prohibits him from wearing, for example, a T-shirt with words on it on the Court grounds (see Appellees' Br. 22). But appellees, having "engage[d] in some conduct that is clearly proscribed[,] cannot complain of the vagueness of the law as applied to the conduct of others." *Village of Hoffman Estates* v. *Flipside, Hoffman Estates, Inc.*, No. 80-1681 (Mar. 3, 1982), slip op. 5; see *Young* v. *American Mini Theatres*, 427 U.S. 50, 58-61 (1976); *Parker* v. *Levy*, 417 U.S. 733, 756 (1974) ("One to whose conduct a statute clearly applies may not successfully challenge it for vagueness.").[7]

In addition, Section 13k, especially as interpreted by the Marshal, is not vague. The Marshal has stated that he enforces Section 13k against "expressive con-

---

[7] The Court has suggested that a different principle may apply when the vagueness of the challenged statute substantially deters the exercise of First Amendment rights. Compare *Young* v. *American Mini Theatres, supra*, 427 U.S. at 59-61, with *United States* v. *Mazurie*, 419 U.S. 544, 550 (1975). To the extent appellees make such a contention, their vagueness argument appears to merge with their overbreadth claim, which we address at pages 12-14, *infra*.

duct, including carrying a sign, passing out leaflets or participating in a demonstration" (Mot. to Aff. App. 38a). Appellees explicity acknowledge that "[t]he longstanding practice of the Marshal is to enforce § 13k against all expressive activities" (Br. 14). A person wearing or carrying an object with words on it while present on the Court grounds for another purpose is not engaged in expressive conduct that threatens the interests protected by Section 13k; nor is an inanimate newspaper machine (Appellees' Br. 24, 36) or the person who placed it there (Appellees' Br. 25) engaged in expressive conduct. Such a consistent administrative interpretation, especially when it reflects "custom and usage" (*Parker* v. *Levy*, *supra*, 417 U.S. at 754), can remove any arguable vagueness from a statute. See *Village of Hoffman Estates* v. *Flipside, Hoffman Estates, Inc.*, *supra*, slip op. 14; *Grayned* v. *City of Rockford*, *supra*, 408 U.S. at 110.[8]

Appellees and amici also assert that Section 13k is overbroad. But unless a statute deters "a substantial amount of constitutionally protected conduct * * * [an] overbreadth challenge must fail." *Village of Hoffman Estates* v. *Flipside, Hoffman Estates, Inc.*, *supra*, slip op. 4-5 (footnote omitted). "[P]articularly where conduct and not merely speech is involved, * * * the overbreadth of a statute must not only be real, but substantial as well, judged in relation to the statute's plainly legitimate sweep." *Broadrick* v. *Oklahoma*, 413 U.S. 601, 615 (1973). Some of the allegedly

---

[8] Appellees' discussion reflects little difficulty distinguishing between expressive activity and other activity that, they assert, falls within the terms of Section 13k. See, *e.g.*, Appellees' Br. 6 n.6 (asserting that an attempt to seek a permit would be futile because no expressive activity is permitted on Court grounds), 7, 9, 14.

overbroad applications that appellees hypothesize—such as groups of tourists posing for pictures on the steps of the Court (Br. 38)—are in fact not within the proscription of Section 13k, which, as interpreted by the Marshal, applies only to "processions or assemblages * * * designed or adapted to bring into public notice a[] party, organization, or movement." And there is no reason to believe that any person—let alone a substantial number of persons—has been deterred by Section 13k from such activities as wearing a T-shirt with a message while incidentally walking across the Court grounds. Since it is the Marshal's practice to warn any person before arresting him for violating Section 13k (Mot. to Aff. App. 38a), anyone who is in doubt may seek guidance at no risk. Moreover, it is unlikely that deterring any person from such an action would affect his *First Amendment* rights; very likely, a person who is not engaging in a public demonstration will choose his attire out of convenience (see page 11 note 7, *supra*), and an overbreadth claim can be made only if First Amendment rights are threatened.

In any event, even if Section 13k were overbroad, the proper remedy—contrary to the court of appeals—would not be to invalidate it on its face:

> When a federal court is dealing with a federal statute challenged as overboard, it should, of course, construe the statute to avoid constitutional problems, if the statute is subject to such a limiting construction. * * * Furthermore, if the federal statute is not subject to a narrowing construction and is impermissibly overbroad, it nevertheless should not be stricken down on its face; if it is severable, only the unconstitutional portion is to be invalidated.

New York v. *Ferber*, No. 81-55 (July 2, 1982), slip op. 22 n.24; see, *e.g.*, *United States* v. *Thirty-Seven*

Photographs, 402 U.S. 363, 367-375 (1971); *id.* at 375 n.3 (plurality opinion).

Finally, appellees urge that their hypothetical examples show that Section 13k does not effectively limit the discretion of those charged with enforcing it. As we recognized in our opening brief (Br. 29, 30), Section 13k, like all statutes, leaves some room for discretionary action. "Condemned to the use of words, we can never expect mathematical certainty from our language." *Grayned* v. *City of Rockford*, *supra*, 408 U.S. at 110 (footnote omitted). The Marshal has interpreted Section 13k to permit certain everyday activities that it was obviously not intended to proscribe but that a highly creative reading of its terms might reach. But as we have explained (Appellants' Br. 28-31; page 7, *supra*) this is a far narrower range of discretion than 18 U.S.C. 1507 permits. We also note that there is no suggestion that Section 13k is enforced in a fashion that discriminates on the basis of the content of expression.[9]

---

[9] We addressed the question of disqualification in the Jurisdictional Statement (J.S. 14-15), where we pointed out that in view of the strong public policy requiring this Court to review decisions invalidating Acts of Congress, any doubts should be resolved against disqualification. We adhere to that position. We would add, in view of that policy and of the fact that Section 13k was declared unconstitutional by a panel of the court of appeals that divided 2-1—and therefore, in effect, by the vote of a single judge—that this Court appears to have the power to remand the case to the court of appeals for further consideration of the government's request for rehearing en banc, should the Court believe that there may not be a quorum of qualified Justices. Compare 28 U.S.C. 2106 with 28 U.S.C. 2109.

For these reasons and the reasons stated in our opening brief, the judgment of the court of appeals should be reversed.

Respectfully submitted.

REX E. LEE
Solicitor General

JANUARY 1983

☆ U. S. GOVERNMENT PRINTING OFFICE: 1983 395998 1251